

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

LILLIAN BERNIER,

Plaintiff,

v.

TURBOCAM, INC.,

Defendant.

Civil Action No. 1:23-cv-00523-LM-AJ

PLAINTIFF LILLIAN BERNIER’S ASSENTED-TO MOTION TO SEAL

Pursuant to Paragraph 6 of the protective order in this case (ECF No. 61), L.R. 83.12 and A.P. 3.3, the plaintiff, Lillian Bernier, requests to seal at Level I Exhibit 12 to the Declaration of Chris Erchull in Support of Plaintiff’s Motion for Summary Judgment (Health Plans, Inc. Clinical Criteria).

This document contains information that has been designated by Plaintiff as “Confidential—Attorney’s Eyes Only” pursuant to the protective order insofar as it contains proprietary information of Health Plans, Inc., a former party to this lawsuit. *See Nachbaur v. Mahoney*, Civ. No. 23-10750-FDS, 2024 U.S. Dist. LEXIS 20360, at *2–3 (D. Mass. Feb. 6, 2024); and N.H. Rev. Stat. Ann. Chapt. 350-B.

Defendant assents to the relief requested in this Motion.

WHEREFORE, the plaintiff, Lillian Bernier, respectfully requests that this Court

A. Seal at Level I Exhibit 12 to the Declaration of Attorney Chris Erchull in Support of Plaintiff’s Motion for Summary Judgment; and

B. Grant such further relief as this Court deems just or equitable.

Respectfully submitted,
Lillian Bernier

By her attorneys,

Date: July 31, 2025

/s/ Chris Erchull

Chris Erchull (N.H. Bar No. 266733)
Bennett Klein (Mass. Bar No. 550702)
Michael Haley (N.H. Bar No. 270236)
GLBTQ Legal Advocates & Defenders
18 Tremont St. Ste. 950
Boston, MA 02108
(617) 426-1350
cerchull@gladlaw.org
bklein@gladlaw.org
mhaley@gladlaw.org

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused the foregoing document to be conventionally filed by email to the following parties:

Bethany Minich
Roger Byron

Date: July 31, 2025

/s/ Chris Erchull
Chris Erchull